## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

ULKU ROWE,

Plaintiff,

Civ. Action No. 19-cv-08655(LGS)(GWG)

v.

GOOGLE LLC,

Defendant.

## NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Opposition to Defendant's Motion for Summary Judgment and in Support of Plaintiff's Cross-Motion for Summary Judgment; Plaintiff's Statements of Undisputed Material Facts Pursuant to Local Civil Rule 56.1;the Declarations of Cara E. Greene, Maya S. Jumper, and Shira Z. Gelfand, and the Exhibits attached thereto; and the declarations of Ulku Rowe and Nicholas Harteau, Plaintiff Ulku Rowe, through her undersigned counsel, now moves this Court, before the Honorable Lorna G. Schofield, at the United States District Court, United States Courthouse, Courtroom 1106 40 Centre Street, to grant Plaintiff's Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56.

PLEASE TAKE FURTHER NOTICE that, pursuant to this Court's August 9, 2021 Order, ECF No. 128, Rule III.C.6 of District Judge Schofield's Individual Rules and Procedures, and the parties' agreement, any opposition to this motion is due by December 22, 2021, and any reply is due by January 12, 2022.

Dated: December 6, 2021 New York, NY Respectfully submitted,

By: /s/ Cara E. Greene

Cara E. Greene
Maya S. Jumper
Shira Z. Gelfand
Outten & Golden LLP
685 Third Avenue, 25th Floor
New York, NY 10017
Telephone: (212) 245-1000
ceg@outtengolden.com
sgelfand@outtengolden.com
mjumper@outtengolden.com

Attorneys for Plaintiff